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April 5, 1999

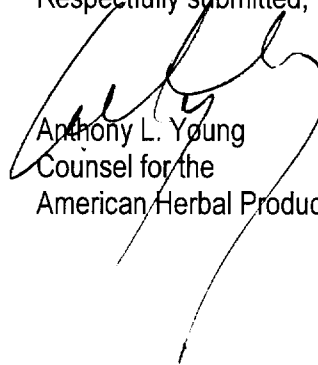
Dockets Management Branch (HFA-305)  
U.S. Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852

Re: Docket No. 98P-0043 Food Labeling; Nutrition Labeling of Dietary Supplements on a "Per Day" Basis

Dear Sir:

Please include within Docket No. 98P-0043 the enclosed comments of the American Herbal Products Association in support of nutrition labeling of dietary supplements on a "per day" basis.

Respectfully submitted,



Anthony L. Young  
Counsel for the  
American Herbal Products Association

ALY/jek  
Enclosure

98P-0043

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BEFORE 4112 '99 APR -6 12:08

THE UNITED STATES OF AMERICA  
DEPARTMENT OF HEALTH AND HUMAN SERVICES  
FOOD AND DRUG ADMINISTRATION

COMMENTS OF THE  
AMERICAN HERBAL PRODUCTS ASSOCIATION

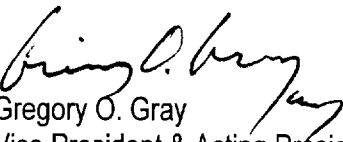
Proposed Regulations on Nutrition Labeling of  
Dietary Supplements on a "Per Day" Basis

April 5, 1999

The American Herbal Products Association ("AHPA") is the national trade association and voice of the herbal products industry, which is comprised of domestic and foreign companies doing business as importers, growers, processors, manufacturers, and distributors of herbs and other botanical products. AHPA serves its members by promoting the responsible commerce of dietary supplements which contain herbs or botanicals and which are used to enhance health and quality of life.

The American Herbal Products Association ("AHPA") supports the proposed regulation (21 C.F.R. § 101.36(e)(9) and (12)) to allow that the quantitative amount and the percent of Daily Value of a dietary ingredient to be voluntarily presented on a "per day" basis in addition to the presently required "per serving" basis in those situations where it is recommended the supplement be taken more than once per day. This proposal evolves from a petition by AHPA member Nutralite Division of Amway Corporation. AHPA supports the proposal on the basis that it provides truthful and not misleading labeling information for use by consumers in evaluating their daily intake of nutrients in the supplements they take.

Respectfully submitted,

  
Gregory O. Gray  
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